

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

**TRUSTEES OF THE PLUMBERS AND
PIPEFITTERS NATIONAL PENSION FUND,**

Plaintiffs,

v.

**PAUL S. YONEY, INC. a/k/a YONEY
INCORPORATED, et al.,**

Defendants.

Civil Action No. 1:96-cv-02427

MOTION TO WITHDRAW APPEARANCE ON BEHALF OF DEFENDANTS

Now comes Brian Steinbach, Esq., and Epstein Becker & Green, P.C. ("current counsel") and move to withdraw their appearance in this case on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al. In support thereof, current counsel state as follows:

1. On April 14, 2003, current counsel entered an appearance in this matter on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al.
2. Current counsel have been unable to reach a resolution with Defendants concerning the terms of their continued representation of Defendants.
3. There are no pending deadlines in this case and therefore withdrawal of current counsel will not significantly delay or otherwise affect the processing of this case.
4. Current counsel has notified Defendants of their proposed withdrawal and that they must have new counsel enter an appearance or be subject to a default judgment on claims against it. The certification required by L. Rule 101(2)(b) is attached as Exhibit A.

WHEREFORE, current counsel, Brian Steinbach, Esq. and Epstein Becker & Green, P.C., respectfully request that their motion to withdraw their appearance on behalf of Defendants Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al., be granted. An appropriate Order is attached.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

/s/

Brian Steinbach
Bar No. 24849
1227 25th Street, N.W.
Suite 700
Washington, D.C. 20037
(202) 861-1870

DATED: January 11, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above Motion to Withdraw Appearance on Behalf of Defendants was served this 11th day of January, 2005, by the means indicated below, on the following:

By Electronic Service:

John R. Harney
O'Donoghue & O'Donoghue
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016

Attorneys for Plaintiffs

By U.S. Mail, First Class Postage Prepaid:

Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al..
c/o Stuart B. Ratner, Esq.
Stuart B. Ratner, P.C.
111 Prospect Street
Stamford, CT 06901

Defendants

/s/

Brian Steinbach